

Exhibit C

Janet Hudnall

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IN THE DISTRICT COURT
DISTRICT OF NEVADA

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KEVIN PHILLIPS,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:12-cv-00344-
C.R. BARD, INC., et al,)	RCJ-WGC
)	
Defendants.)	
)	

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FRIDAY, NOVEMBER 1, 2013

DEPOSITION OF JANET HUDNALL

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REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 being a gap when all that the company had was two
2 permanent devices that it was actively marketing,
3 and that is a G2 and a Simon Nitinol filter?

4 A. That sounds right, yes.

5 Q. And -- and that the Simon -- that the
6 Recovery filter was taken off the market because of
7 the excess complications that it had?

8 MR. NORTH: Objection to the form. No
9 foundation.

10 THE WITNESS: The G2 filter was the next
11 generation of the Recovery filter. So we didn't
12 keep previous generation and new generation --

13 Q. BY MR. LOPEZ: No, no, but --

14 A. -- at the same time.

15 Q. Well, but it wasn't really a next
16 generation from the standpoint --

17 A. Of course it was.

18 Q. Wait. Let me finish.

19 From the standpoint of its retrievability.
20 It did not have the retrievability indication when
21 it got -- when it got cleared under 510(k), did it?

22 A. It was being studied for retrievability.

23 Q. Right. But -- but there was a time period
24 when the company did not have a retrievable device
25 it was marketing?